

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

WHAT HURTS, LLC,

Plaintiff,

v.

VOLVO PENTA OF
THE AMERICAS, LLC,

Defendant.

Case No. 2:22-cv-00552-MSD-LRL

DECLARATION OF CHARLES F. WOLF, ESQ.
PURSUANT TO 28 U.S.C. § 1746

1. My name is Charles F. Wolf.
2. I am over the age of 18 and otherwise competent.
3. Though I am not counsel of record for defendant Volvo Penta of the Americas, LLC (“Volvo Penta”) in this case, I work closely with Christina Paul and Joshua Carpenter, who are counsel of record.
4. As the trial for this matter has been approaching, I have been providing assistance to Christina Paul and Joshua Carpenter, including legal and factual research as appropriate.
5. I am a member of the Florida bar in good standing.
6. On Friday, January 19, 2024, I conducted background research on various witnesses expected to be called at trial.
7. I ran a Google search for the combined terms “Brent Loring” and “What Hurts.”
8. One of the Google results that I found was the case caption for a federal lawsuit involving Brent Loring and What Hurts that had a different case number than the immediate action.

9. I searched that case number on the PACER database, and found the *Fast Response Marine Towing & Salvage, LLC v. M/Y What Hurts, Brent Loring, et. al.* action with case number 1:2023-cv-20668 that had been previously filed in the Southern District of Florida.

10. I immediately brought this to the team's attention.

11. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Charles F. Wolf

Charles F. Wolf, Esq.